

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

IN RE:	§	
BRANDI R. MCDANIEL,	§	CASE NO. 18-10389-JDW
	§	
	§	CHAPTER 7
DEBTOR.	§	

MOTION TO AVOID A JUDGMENT LIEN

COMES NOW the Debtor in the above-styled cause, by and through her counsel of record, and files this Motion to Avoid Judgment Lien of the Creditor, **TRUSTMARK NATIONAL BANK**,

That prior to filing her Chapter 7 Bankruptcy case, the Creditor, **TRUSTMARK NATIONAL BANK**, obtained a judgment against the Debtor. The Creditor has filed said judgment in the judgment rolls of the Debtor's resident county, that being **OKTIBBEHA COUNTY (Book 162 Page 483-4 for Judgment in 2010-0041-CV, electronic Judgment number 15429, renewed March 10, 2017)**. That the judgment impairs an exemption that the Debtor would be otherwise entitled to, under Title 85, Chapter 3 of the Mississippi Code and 11 U.S.C. § 522(b).

Therefore the Debtor respectfully requests that the Court receives, and docket the Motion, and that upon hearing, the Court issue an Order Avoiding the Judgment of **TRUSTMARK NATIONAL BANK**, against the Debtor, such other and further relief as this Court deems just and proper under the circumstances.

RESPECTFULLY SUBMITTED,

BRANDI R. MCDANIEL

By: /s/Stephanie L. Mallette
Stephanie L. Mallette
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CERTIFICATE OF SERVICE

I, STEPHANIE L. MALLETTE, Attorney for the Debtor, do hereby certify that I have this day mailed by the United States Mail, postage prepaid, or sent electronically via the Court's Electronic Case Filing System, a true and correct copy of the above-and foregoing Motion to Avoid Lien and other Relief, to the following listed below:

Hon. Henry J. Applewhite, Chapter 7 Trustee
happlewhite@applewhitelaw.com

The Office of the United States Trustee
USTPRegion.05.AB.ECF@usdoj.gov

Trustmark National Bank
% Sanford & Adams, PLLC
3 Country Place
Pearl, MS 39208

Trustmark National Bank
P.O. Box 291
Jackson, MS 39205

So Certified, this the 6th day of February, 2018.

/s/Stephanie L. Mallette
Stephanie L. Mallette
Attorney for Debtor